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10 Attorneys for Defendant
11 CMG MORTGAGE, INC. D/B/A CMG FINANCIAL

12
13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 JEFFREY K. ENGLER and KATHERINE M.
16 SENNES-ENGLER,

17 Plaintiff,

18 v.
19 CMG MORTGAGE, INC. D/B/A CMG
20 FINANCIAL,

21 Defendant.

22 Case No. 2:19-cv-00869-GMN-BNW

23 [PROPOSED] STIPULATION AND
24 ORDER TO EXTEND DISCOVERY

25 [FOURTH REQUEST]

26 Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 26-1, Plaintiffs Jeffrey K. Engler and
27 Katherine M. Sennes-Engler (“Plaintiffs”) and CMG Mortgage Inc. d/b/a CMG Financial (“CMG”)
28 (collectively the “Parties”), by and through their attorneys, hereby stipulate to extend discovery
deadlines and other deadlines in the April 27, 2020 Scheduling Order (ECF No. 27) as follows:

29 1. Completed Discovery.

30 The parties have exchanged initial and supplemental disclosures. Defendant has responded
31 to written discovery requests and produced documents. Defendant has served written discovery,
32 and party depositions have all previously been noticed / will be re-noticed.

1 **2. Remaining Discovery.**

2 Written discovery responses from Plaintiff and the parties' deposition.

3 **4. Good Cause.**

4 The Parties previously sought extensions of discovery due to COVID-19 and has proceeded
5 with discovery. Cenlar's current deposition is noticed for June 12, 2020, with Plaintiffs' discovery
6 responses due June 11, 2020. Plaintiffs have offered a settlement proposal, which involves a
7 modification of the loan terms. That proposal remains pending at this time, and Cenlar is
8 determining the loan terms it can offer to Plaintiffs. Loan modification proposals require a process
9 that differs from obtaining monetary settlement authority, and due to COVID-19 there has been
10 some delays in the process.

11 Thus, the parties are seeking one last extension in hopes that this matter can be resolved
12 without incurring the costs of proceeding with the party depositions. This stipulation is made in
13 good faith, is not interposed for delay, and is not filed for an improper purpose. Furthermore, a trial
14 date has not been set at this time.

15 **5. Current Discovery Deadlines.**

- 16 • Discovery Cutoff: **July 10, 2020**
- 17 • Dispositive Motion deadline: **August 10, 2020**
- 18 • Joint Proposed Pretrial Order: **September 10, 2020**

19 **6. Proposed Discovery Deadlines.**

- 20 • Discovery Cutoff: **August 25, 2020**
- 21 • Dispositive Motion deadline: **September 25, 2020**
- 22 • Joint Proposed Pretrial Order: **October 26, 2020**

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1 IT IS SO STIPULATED.
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DATED: June 10, 2020

4 WOLFE & WYMAN LLP

5 By: /s/ Andrew A. Bao
6 ANDREW A. BAO, ESQ.
7 Nevada Bar No.: 10508
8 6757 Spencer Street
9 Las Vegas, NV 89119
10 *Attorneys for Defendant*
11 CMG MORTGAGE, INC. D/B/A CMG
12 FINANCIAL

DATED: June 10, 2020

HAINES & KRIEGER, LLC

By: /s/ George Haines
GEORGE HAINES, ESQ.
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JEFFREY K. ENGLER AND KATHERINE M.
SENNES-ENGLER



ORDER GRANTING
STIPULATION TO EXTEND DISCOVERY

In consideration of the parties' stipulation and good cause showing, **IT IS ORDERED THAT**
the April 27, 2020 Scheduling Order (ECF No. 27) shall be amended as follows:

- Discovery Cutoff: **August 25, 2020**
 - Dispositive Motion deadline: **September 25, 2020**
 - Joint Proposed Pretrial Order: **October 26, 2020**

IT IS SO ORDERED.

Barlow Wekay

Dated: June 11, 2020

